

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

STRYKER CORPORATION, et al.,

Plaintiffs,

v.

CHRISTOPHER RIDGEWAY, et al.,

Defendants.

File No. 1:13-CV-01066

The Honorable Robert Holmes Bell

STONE SURGICAL, LLC,

Plaintiff,

v.

STRYKER CORPORATION, et al.,

Defendants.

File No. 1:14-CV-889

The Honorable Robert Holmes Bell

MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL

Defendant, Christopher Ridgeway, pursuant to Local Rule 10.6, moves this Honorable Court for an Order granting leave of Court to file Exhibits to its Memorandum in Support of Motion for Partial Summary Judgment (Rec. Doc. 119) under seal, upon representing that this Honorable Court has not entered a previous Order authorizing the submission of the documents under seal, but that the Court has entered a Protective Order (Rec. Doc. 100) requiring Christopher Ridgeway to maintain the “confidential” designation made by Stryker Corporation to these Exhibits, which were produced by Stryker and are listed as follows:

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1	Bates No. STRBIO00009009 consists of an email string by Sarah Krupinski to Cameron Hunter dated September 6, 2013 acknowledging that Stryker has no Non-Compete Agreement for Christopher Ridgeway
4	Bates No. STRBIO00008471-79 is an Employee Non-Compete Agreement between Stryker Leibinger, Inc. and Todd Washington dated July 1, 2000
5	Bates No. STRBIO00007840-48 is an Employee Non-Compete Agreement between Danny Chonkich and Stryker Leibinger, Inc. dated July 1, 2000
6	Bates No. STRBIO00003846-47 is an Engagement Letter hiring Tyson Stull dated April 19, 2001 referencing "the enclosed Employee Non-Compete Agreement"
7	Bates No. STRBIO00003859 is an Engagement Letter dated May 14, 2001 hiring Joseph Slattery referencing "the enclosed Employee Non-Compete Agreement"
8	Bates No. STRBIO00003872-75 is an Engagement Letter dated November 9, 2001 hiring Chris Schuldt referencing "the enclosed Employee Non-Compete Agreement" and attaching the Non-Compete Agreement prepared for the signature of Jonathan Bagrosky, but signed by Jeff Semon on May 30, 2002
9	Bates No. STRBIO00007914 is a Signature page to Non-Compete Agreement signed by Darrin Dixon on November 7, 2001 and prepared for the signature of Jonathan Bagrosky, but signed by R.J. Semon on May 29, 2002
10.	Bates No. STRBIO00008042-50 is an Employee Non-Compete Agreement of Michael Hoppe dated February 5, 2001 signed by Jonathan Bagrosky
11.	Bates No. STRBIO00014191 is the 2011 Performance Review of Christopher Ridgeway
14.	Bates No. STRBIO00014213 is the 2008 Performance Review of Christopher Ridgeway

RESPECTFULLY SUBMITTED:

/s/ Wade P. Webster

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CERTIFICATE OF SERVICE

I do hereby certify that a copy of the foregoing was on this 9th day of December, 2014 filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Wade P. Webster